

Comments of Thomas R. Swisher, Jr.
Amateur Radio licensee WA8PYR

In Re: RM-10811

I am an Extra Class licensee, and have held an amateur radio license continuously for over 23 years, having been first licensed in 1980 as KA8KCE. I am employed in the public safety communications field, and have extensive experience in various facets of the emergency services, including firefighting/EMS as well as law enforcement. As such, I have been called upon to provide communications support in both the communications office and emergency scene settings, as an amateur radio operator and as a public safety professional. I am also a volunteer examiner.

I am in general agreement with parts of this petition, but I cannot agree that a permanent retention of the CW requirements for licensing would be more than a token benefit to the Amateur Radio Service, and there are certain portions of the petition which I must comment on specifically.

In regards to paragraph 1 of the petition, I cannot agree or disagree with the petitioner's comments. Not having provided a factual reference for the assertion that CW is the second-most popular mode of operation, I do not feel that this assertion can be upheld. In my monitoring of the amateur HF bands, I hear far more voice communications than I do CW. The opposite may be true in other parts of the United States, so this assertion seems more subjective than objective.

I am fully in agreement with the petitioner's comments in paragraphs 3 and 4.

The General Principles stated by the petitioner in paragraph 5 are well thought out, but I cannot agree with section 5A as it is proposed by the petitioner, which requests retention of CW testing within the licensing structure. Continuous Wave transmission (also known as CW or Morse code) is but one of many modes used by the amateur radio service. While it is true that Morse can get through where other modes cannot (as stated in paragraph 2), the same might be said of some of the narrow-band digital modes now evolving, and what is Morse code but the original digital mode?

Paragraphs 6 through 12 of the petition give a number of reasons why the petitioner feels CW testing should remain a part of the licensing structure. I feel, however, that reliance on only one single mode of operation for this purpose is short-sighted. Knowledge of Morse Code is not the be-all, end-all of communications, and Morse Code is, after all, just another mode of operation. Use of it is a personal choice. Rather than an outdated reliance on requiring knowledge of a specific mode of operation to attain higher license class, it would be far better to examine a potential licensee's knowledge of technical matters, legal requirements and proper operating practices and procedures. Applicants should also be tested for a basic knowledge of CW rather than ability to copy CW at a specific speed, as well as testing for basic knowledge of other modes of operation. If an individual then chooses to use a specific mode, he or she can then build upon the basic knowledge that has been acquired.

The petition also gives in paragraphs 6 through 19 a number of educational and technical reasons why a CW requirement should be retained. While I am wholeheartedly in favor of the goal of bringing more young people into the Amateur Radio Service, the overall tone or theme of much of this portion of the petition is that lack of a CW testing requirement will lead to extinction of the mentioned activities. I cannot agree with the petition on this. Historically,

not all amateurs have continued to use CW after passing their examinations. Those who passed their CW exams to attain a higher license class and wished to continue using CW have done so; those who did not so desire moved on to other modes. Lack of a specific CW requirement rather than simple knowledge will not change this. I also strongly disagree with petitioner's assertion that elimination of Morse testing will undermine the core activities of the Amateur Radio Service, and especially that it will nullify the traditional objective to "train a reserve pool of qualified radio operators and technicians." One does not need to know Morse Code to be an effective radio operator and technician, and the petitioner's assertion to that effect is patently absurd.

Regarding paragraphs 20, 21 and 22 of the proposal, I am in complete agreement. Merging of the Technician and Technician with HF (or Technician Plus) categories will simplify the examination process, and will also provide a means for verification of HF privileges held by licensees, through the simple expedient of an FCC license database search.

In general, I cannot agree with paragraphs 23 through 28. I am in favor of greatly increased technical requirements for the examination process, but I feel that testing for simple knowledge of Morse Code coupled with much more technically challenging examinations should be sufficient.

I am in agreement with the proposal to retain the Novice CW sub-bands, and also agree that Novices and Technicians should be permitted to use any digital mode in these sub-bands. The Technician license could thus become a code free entry-level license for HF as well as VHF/UHF. Advancement to higher license class could then come through simple knowledge of Morse code rather than a demand for proficiency, which can be built upon a simple knowledge of the code.

I strongly disagree with the petitioner in regard to paragraphs 30 and 31. As a Volunteer Examiner, I've seen people come through who may be having a case of "pre-test jitters"; this is common for many people, even when they have a good grasp of the examination material. Some people are nervous the first time around, and missed a passing grade by only a few questions. Upon taking the test again at the same session, the result was in many cases a nearly perfect score. I have also never felt it to be a burden to allow one or two individuals to retake an examination. However, I would not have a problem with limiting an individual to one retest at a specific session.

I am generally in agreement with the petition in regards to paragraphs 32 through 35.

Morse Code is indeed, as stated in the petition, a stepping-stone to many radio related activities. It is not, however, the only such stepping stone, and should no longer be relied upon as an indicator of an individual's fitness to receive an Amateur Radio license. I feel that testing for simple knowledge of Morse Code, coupled with written examinations that place a heavy emphasis on technical knowledge and proper operating practices should be sufficient to attain higher license class.

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